

1 The Honorable Marsha J. Pechman
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APR 04 2008

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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 Richard O. Buse,

12 Plaintiff,

v.

13 First American Title Insurance Company,
14 Foreclosurelink, Inc., Greenpoint Mortgage
15 Funding, Inc., Mortgage Electronic
16 Registration Systems, Inc., Rescomm
17 Holdings No. 2, LLC, UM Acquisitions,
18 LLC, Tom Block, and Doe Defendants 1
19 through 20,

20 Defendants.

Case No. C-08-0510-MJP

21 **NOTICE OF JOINDER BY ALL
22 DEFENDANTS IN NOTICE OF
23 REMOVAL BY DEFENDANT
24 MORTGAGE ELECTRONIC
25 REGISTRATION SYSTEMS, INC.**

26 **TO: THE CLERK OF THE COURT**

AND TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

27 **PLEASE TAKE NOTICE** that all defendants to this action agree that removal of this
28 action to federal court is proper and, through this Notice of Joinder, which is signed by all
29 defendants or their respective counsel, join in the Notice of Removal by Defendant Mortgage
30 Electronic Registration Systems, Inc., filed on April 1, 2008. All defendants served in this
31 action agreed to join in removing this action within thirty (30) days of the date the first
32 defendant served with the summons and complaint received such service, which occurred on
33

34 NOTICE OF JOINDER IN NOTICE OF REMOVAL
35 BY DEFENDANT MORTGAGE ELECTRONIC
36 REGISTRATION SYSTEMS, INC.
37 C-08-0510-MJP - 1

38 DLA Piper US LLP
39 701 Fifth Avenue, Suite 7000
40 Seattle, WA 98104-7044 | Tel: 206.839.4800

1 March 6, 2008. Therefore, joinder by all defendants in the removal of this action is timely.

2 By joining in the removal of this action none of the below-signed defendants are
3 acknowledging that this case is proper or actionable and no defendant waives any defenses
4 available to it at law, including without limitation, defenses of lack of subject matter or
5 personal jurisdiction or any other valid defense.

6 **RESPECTFULLY SUBMITTED** this 4th day of April, 2008.

7
8 **FIRST AMERICAN TITLE INSURANCE COMPANY** **FORECLOSURELINK, INC.**

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12 525 East Main Street
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15 E-mail: psalmon@piteduncan.com

16 Attorneys for Defendant First American
17 Title Insurance Company

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19 **GREENPOINT MORTGAGE
FUNDING INC.**

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16 Attorney for Defendant Foreclosurelink, Inc.

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18 **MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.**

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25 Attorneys for Defendant Mortgage Electronic
26 Registration Systems, Inc.

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51 NOTICE OF JOINDER IN NOTICE OF REMOVAL
52 BY DEFENDANT MORTGAGE ELECTRONIC
53 REGISTRATION SYSTEMS, INC.
54 C-08-0510-MJP - 2

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RESCOMM HOLDINGS NO. 2, LLC

UM ACQUISITIONS, LLC

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TOM BLOCK

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Attorneys for Defendant Tom Block

**NOTICE OF JOINDER IN NOTICE OF REMOVAL
BY DEFENDANT MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.
C-08-0510-MJP - 3**

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1 **RESCOMM HOLDINGS NO. 2, LLC**

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17 Attorneys for Defendant Tom Block

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NOTICE OF JOINDER IN NOTICE OF REMOVAL
BY DEFENDANT MORTGAGE ELECTRONIC
REGISTRATION SYSTEMS, INC.
C-08-0510-MJP - 3

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Seattle, WA 98104-7044 | Tel: 206.839.4800

CERTIFICATE OF SERVICE

I, Shelley Barolet, hereby certify that on the 1st day of April, 2008, I caused to be served via U.S. Mail the following:

1. Notice of Joinder by All Defendants in Notice of Removal by Defendant Mortgage Electronic Registration Systems, Inc.; and
2. Certificate of Service

to the following:

Melissa A. Huelsman
LAW OFFICES OF MELISSA A.
HUELSMAN, P.S.
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Attorney for Plaintiff Richard O. Buse

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Recovery Manager
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*Attorney for Defendants Greenpoint
Mortgage Funding, Inc. and Tom
Block*

Peter Salmon, WSBA No. 31382
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525 East Main Street
El Cajon, CA 92022

*Attorney for Defendants First
American Title Insurance Company
and Foreclosurelink, Inc.*

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Shelley G. Barolet
Shelley Barolet

SE9109524,1

CERTIFICATE OF SERVICE - 1

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